

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
NEWPORT NEWS DIVISION**

RONALD W. WALDEN JR.,

Plaintiff,

v.

SEAWORLD PARKS &  
ENTERTAINMENT, INC., a Delaware  
Corporation,

Defendant.

Case No. 4:11-cv-0113 – MSD – FBS

**PLAINTIFF’S MOTION TO COMPEL RESPONSES TO INTERROGATORIES  
AND REQUESTS FOR THE PRODUCTION OF DOCUMENTS**

Plaintiff, Ronald W. Walden, Jr. (“Plaintiff”), by and through undersigned counsel, moves this Court, pursuant to Fed. R. Civ. P. 37 and Local Rule 37, and for the reasons stated in the accompanying Memorandum in Support (filed herewith), to compel responses to interrogatories and requests for production of documents.

Date: January 12, 2012

Respectfully Submitted,

KU & MUSSMAN, P.A.

By: /s/ M. Ryan Casey

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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 12th day of January 2012, a true and correct copy of the foregoing has been furnished by ECF and by U.S. Mail to all counsel of record.

By: /s/ M. Ryan Casey  
M. Ryan Casey, Esq.